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12
13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 GEOFF WINKLER, as court-appointed
16 receiver for J&J Consulting Services, Inc.,
an Alaska corporation; J&J Consulting
17 Services, Inc., a Nevada corporation; and J
and J Purchasing LLC, Florida limited
18 liability company,

19 Plaintiff,

20 v.

21 WELLS FARGO BANK, N.A.,

22 Defendant.

Case No.: 2:23-cv-00703-GMN-NJK

**STIPULATION TO EXTEND
BRIEFING SCHEDULE FOR MOTION
FOR SUMMARY JUDGMENT**

Judge: The Hon. Gloria M. Navarro

The Hon. Nancy J. Koppe

1 Pursuant to LR 7-1, LR IA 6-1, and LR IA 6-2, Plaintiff Geoff Winkler (the “Receiver” or
2 “Plaintiff”) and Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) (collectively, the “Parties”)
3 jointly stipulate concerning the briefing schedule of Wells Fargo’s Motion for Summary Judgment
4 filed on April 23, 2025 as follows:

5 WHEREAS, on January 16, 2025, the parties filed a stipulation to set a briefing schedule
6 on Motions for Summary Judgment, which the Court entered the same day, ECF Nos. 128 and
7 129;

8 WHEREAS, on April 23, 2025, Wells Fargo filed its Motion for Summary Judgment in
9 this Action pursuant to the briefing schedule, ECF No. 137;

10 WHEREAS, on June 2, 2025, the Receiver filed his Opposition to Wells Fargo’s Motion
11 for Summary Judgment, pursuant to the briefing schedule, ECF No. 140;

12 WHEREAS, pursuant to the briefing schedule, Wells Fargo’s Reply in Support of its
13 Motion for Summary Judgment is currently due on June 23, 2025, ECF No. 129;

14 WHEREAS, on May 29, 2025, the Receiver’s counsel informed Wells Fargo’s counsel that
15 a document production from the SEC Action had inadvertently not been loaded into the Receiver’s
16 document management system, due to the inadvertence he had not produced the documents to
17 Wells Fargo, and he was working to immediately produce those documents to Wells Fargo;

18 WHEREAS, Wells Fargo’s vendor received that document production on June 9, 2025;

19 WHEREAS, the document production is 120 GB and approximately 250,000 pages;

20 WHEREAS, Wells Fargo is now working to process and review the documents in the
21 production;

22 WHEREAS, to provide time for Wells Fargo to review the additional production, and if
23 necessary, address the additional documents in its summary judgment briefing, the Parties agree
24 and request to extend Wells Fargo’s Reply in Support of its Motion for Summary Judgment by 30
25 days to July 23, 2025;

26 NOW THEREFORE, the Parties stipulate as follows, subject to the Court’s approval:

- 27 (a) The deadline for Wells Fargo’s Reply in Support of its Motion for Summary
28 Judgment shall be extended by 30 days until July 23, 2025.

1 Dated: June 10, 2025

Respectfully submitted,

2
3 By: /s/ Marcelo Diaz-Cortes (with permission)

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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to counsel of record via the ECF system.

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17 Inc., a Nevada corporation; and J and J
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19 Plaintiff,

20 v.

21 WELLS FARGO BANK, N.A.,

22 Defendant.

Case No.: 2:23-cv-00703-GMN-NJK

**ORDER GRANTING STIPULATION
TO EXTEND BRIEFING SCHEDULE
FOR MOTION FOR SUMMARY
JUDGMENT**

1 This matter comes before the Court on the parties' Stipulation to Extend Briefing Schedule
2 for Motion for Summary Judgment. Upon consideration of the Stipulation, the Court hereby
3 GRANTS the Stipulation. It is HEREBY ORDERED that:

4 (a) Wells Fargo's reply in support of its Motion for Summary Judgment shall be
5 extended by 30 days until July 23, 2025.

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7 **IT IS SO ORDERED.**

8 
U.S. District Court Judge

9 DATED: June 12, 2025
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